

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:15CR00049 CDP/DDN
)	
SEDINA UNKIC HODZIC,)	
)	
Defendant.)	

DEFENDANT SEDINA HODZIC'S MOTION TO CONTINUE
DETENTION HEARING

Comes now Defendant Sedina Hodzic, by and through her counsel Paul J. D'Agrosa and pursuant to 18 U.S.C. § 3142(f)(2) does hereby move for a continuance of the detention hearing, currently scheduled for 2:00 p.m. on today's date, February 11, 2015. In support thereof, Defendant states as follows:

1. Defendant made her initial appearance before the Magistrate Judge on February 6, 2015. Undersigned counsel was subsequently appointed per the CJA and entered his appearance on February 9, 2015.

2. As a result of the Government's Motion for Detention [doc. 6], this Court scheduled a detention hearing for today, February 11, 2016 at 2:00 p.m. Arraignment is also scheduled for the same time.

3. After consultation with the Defendant and a preliminary briefing by the Government, it has become evident that Defendant requires additional time to prepare for the detention hearing. A continuance would be in the best interests of the Defendant.

4. The Government, by Assistant U.S. Attorney Matthew Drake, has no objection

to the continuance.

5. The parties agree that a continuance of no more than five (5) days would be necessary, consistent with this instant motion and 18 U.S.C. §3142(f)(2). Further, the parties agree that arraignment should occur today.

WHEREFORE, for the foregoing reasons Defendant Sedina Hodzic, by and through counsel requests this Court enter an order continuing the detention hearing, currently scheduled for today.

Respectfully submitted,

LAW OFFICES OF
WOLFF & D'AGROSA

/s/Paul J. D'Agrosa
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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February, 2014⁵ the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: Mr. Matthew Drake, Mr. Howard Marcus and Mr. Kenneth Tihen Assistant U.S. Attorneys, and all counsel of record.

/s/ Paul J. D'Agrosa
Paul J. D'Agrosa (#36966MO)